

JEFFREY S. EISENBERG  
ATTORNEY AT LAW  
2500 NESCONSET HIGHWAY  
STONY BROOK, NEW YORK 11790  
*lawyer@nyprolaw.com*  
(516) 735-4337

September 23, 2020

VIA ECF

Hon. Joanna Seybert  
U.S. District Court  
Eastern District of New York

Re: AA Medical P.C. v. Khaled Almansoori  
(Case No. 20-cv-3852 (JS) (ARL))

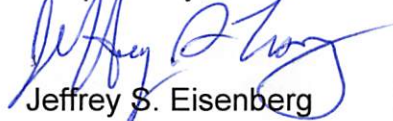
Dear Judge Seybert:

I am the attorney for the plaintiff, AA Medical P.C. in the above-referenced action. Please consider this letter the response to the request by counsel for defendant for an extension to answer or otherwise respond to the Verified Complaint.

This case alleging fraud was commenced by personal service on defendant in Illinois on September 1, 2020. Apparently, the defendant waited until the day before his response was due to retain counsel. In response to an email request from counsel I sent a stipulation forthwith extending the time to answer. This form of stipulation is one I use in every case when a request for an extension is made. Also, in over thirty years of practice I have never been granted an extension of time to otherwise respond to a complaint, only to submit an answer. An extension of time to answer or otherwise respond to a complaint is effectively giving more time for a pre-answer dispositive motion or procedural motion. That I was not willing to grant, and I am fairly certain counsel for defendant would have acted similarly in my position.

In any event, when I was contacted I assured counsel that I would certainly not take steps toward a default. However, other than granting more time than I originally gave to answer I was unable to allow more time for defendant's pre-answer motion practice, whatever is planned by counsel for defendant which of course was not divulged to me.

Respectfully,



Jeffrey S. Eisenberg

cc: Defendant's counsel (via ECF)